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TO: Docket Control

FROM: Elijah O. Abinah  
Director  
Utilities Division

DATE: March 25, 2019

RE: DOCKET NO. RU-00000A-18-0284

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The following document is the Arizona Corporation Commission Staff Draft Implementation Plan for the Electric Vehicles, Electric Vehicle Infrastructure, and the Electrification of the Transportation Sector in the Arizona Policy Statement. It will serve as the basis for discussion at the March 26, 2019 Electric Vehicle Stakeholder meeting.

Copies of this letter will not be mailed and a courtesy email will be sent to those who provided an email and attended the workshop on Monday, February 25, 2019.

EAO:DJM:elr

Originator: Drake Moran

Attachments

Arizona Corporation Commission

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Ed Brolin  
Just Energy  
87 Hamilton Place, Suite 6F  
New York, New York 10031  
[ebrolin@justenergy.com](mailto:ebrolin@justenergy.com)  
**Consented to Service by Email**

Rick Umoff  
Solar Energy Industries Association  
505 9th Street NW, Suite 800  
Washington, District of Columbia 20004

Thomas J. Pyle  
Institute For Energy Research  
1155 15th Street NW, Suite 900  
Washington, District of Columbia 20005

Hannah Polikov  
1000 Vermont Avenue NW  
3rd Floor  
Washington, District of Columbia 20005

Valerie Hayes  
Direct Selling Association  
1667 K Street NW - 1100  
Washington, District of Columbia 20006

Nitzan Goldberger  
Energy Storage Association  
1800 M Street, NW, Suite 400S  
Washington, District of Columbia 20036

Dan Byers  
Global Energy Institute  
1615 H. Street NW  
Washington, District of Columbia 20062

Jennifer Kefer  
The Alliance For Industrial Efficiency  
2609 11th Street N.  
Arlington, Virginia 22201

John Fernandes  
Renewable Energy Systems Americas  
INC.  
11101 West 120th Avenue  
Suite 400  
Broomfield, Colorado 80021

Brad Nelson  
7001 SW 24th Avenue  
Gainesville, Florida 32607

Sundevil Power Holdings, LLC  
Attn: Mark Thompson & Ray Wallander  
c/o Wayzata Investment Partners

701 East Lake Street - 300  
Wayzata, Minnesota 55391

Heather Kreager  
Gila Bend Power Partners  
5949 Sherry Lane, Suite 1900  
Dallas, Texas 75225-6553

Craig G. Goodman  
National Energy Marketers Association  
3333 K Street, NW, Suite 110  
Washington, District of Columbia 20007  
[srantala@energymarketers.com](mailto:srantala@energymarketers.com)  
[cgoodman@energymarketers.com](mailto:cgoodman@energymarketers.com)  
**Consented to Service by Email**

Chris Hendrix  
2001 S.E. 10th Street  
Bentonville, Arkansas 72716

Harry Kingerski  
1301 McKinney, Level 12  
Houston, Texas 77010

Benjamin Lowe  
ALEVO USA INC.  
2321 Concord Parkway S.  
Concord, North Carolina 28027

Thad Kurowski  
470 East 76th Avenue  
Unit 3A  
Denver, Colorado 80229

Ken Wilson  
Western Resource Advocates  
2260 Baseline Road, Suite 200  
Boulder, Colorado 80302

Stacy Tellinghuisen  
Western Resource Advocates  
2260 Baseline Road  
Boulder, Colorado 80302

Rick Gilliam  
The Vote Solar Initiative  
1120 Pearl Street, Suite 200  
Boulder, Colorado 80302

Christopher D. Thomas  
Fred E. Breedlove III  
Squire Sanders (US) LLP  
1 East Washington, 27th Floor  
Phoenix, Arizona 85004

Neil Kolwey  
Southwest Energy Efficiency Project  
2334 North Broadway, Suite A  
Boulder, Colorado 80304

Briana Kobor  
358 South 700 E  
Salt Lake City, Utah 84102  
[briana@votesolar.org](mailto:briana@votesolar.org)  
[maddy@votesolar.org](mailto:maddy@votesolar.org)  
**Consented to Service by Email**

Kevin C. Higgins  
Energy Strategies, LLC  
215 South State Street, Suite 200  
Salt Lake City, Utah 84111

Brett Kraus  
99 East 700 S.  
Logan, Utah 84321

Timothy M. Hogan  
Arizona Center for Law in the Public  
Interest  
514 West Roosevelt Street  
Phoenix, Arizona 85003

Leland R. Snook  
Arizona Public Service Company  
400 North 5th Street, MS 8695  
Phoenix, Arizona 85004

Tim Lindl  
Keyes, Fox & Wiedman LLP  
436 14th Street - 1305  
Oakland, California 94612

Ladel Laub  
Dixie-Escalante Rural Electric  
Association, Inc.  
71 East Highway 56  
Beryl, Utah 84714-5197

Annie Lappe  
1120 Pearl Street, Suite 200  
Boulder, Colorado 80302

Dan McClendon  
Garkane Energy Cooperative, Inc.  
Post Office Box 465  
Loa, Utah 84747

Nicholas J. Enoch  
Lubin & Enoch, PC  
349 North Fourth Avenue  
Phoenix, Arizona 85003

# Arizona Corporation Commission - Rulemaking

Docket No. RU-00000A-18-0284

Page 3

James M. Hamilton  
Hamilton Consulting  
822 North 5th Avenue  
Phoenix, Arizona 85003

Julie Rees  
TRIADVOCATES LLC  
3636 North Central Avenue - 1150  
Phoenix, Arizona 85004

Kathy Senseman  
Policy Development Group  
3636 North Central Avenue - 590  
Phoenix, Arizona 85012

Joseph A. Drazek  
Quarles & Brady LLP  
One Renaissance Square  
Two North Central Avenue  
Phoenix, Arizona 85004

Albert H. Acken  
Ryley Carlock & Applewhite  
One North Central Avenue  
Suite 1200  
Phoenix, Arizona 85004

Linda J. Benally  
400 North 5th Street, MS 8695  
Phoenix, Arizona 85004

Thomas H. Campbell  
Lewis Roca Rothgerber Christie, LLP  
201 East Washington Street  
Suite 1200  
Phoenix, Arizona 85004

Jason D. Gellman  
Snell & Wilmer, LLP  
One Arizona Center  
400 East Van Buren Street  
Suite 1900  
Phoenix, Arizona 85004

Michael Patten  
Snell & Wilmer, LLP  
One Arizona Center  
400 East Van Buren Street  
Suite 1900  
Phoenix, Arizona 85004  
[docket@swlaw.com](mailto:docket@swlaw.com)  
[bcarroll@tep.com](mailto:bcarroll@tep.com)  
[jthomes@swlaw.com](mailto:jthomes@swlaw.com)  
[mpatten@swlaw.com](mailto:mpatten@swlaw.com)  
[mdecorse@tep.com](mailto:mdecorse@tep.com)  
**Consented to Service by Email**

Scott S. Wakefield  
Ridenour, Hinton & Lewis, P.L.L.C.  
201 North Central Avenue  
Suite 3300  
Phoenix, Arizona 85004-1052

Richard Adkerson  
Ajo Improvement Company  
333 North Central Avenue

Phoenix, Arizona 85004-2189

Kenneth C. Sundlof, Jr.  
Jennings Strouss & Salmon, P.L.C.  
One East Washington Street  
Suite 1900  
Phoenix, Arizona 85004-2554  
[sundlof@jsslw.com](mailto:sundlof@jsslw.com)  
[mliska@jsslw.com](mailto:mliska@jsslw.com)  
**Consented to Service by Email**

Robert S. Lynch  
340 East Palm Lane, Suite 140  
Phoenix, Arizona 85004-4603  
[todd@rslynchatty.com](mailto:todd@rslynchatty.com)  
[rslynch@rslynchatty.com](mailto:rslynch@rslynchatty.com)  
**Consented to Service by Email**

Greg Patterson  
Competitive Power Alliance  
916 West Adams, Suite 3  
Phoenix, Arizona 85007

Daniel Pozefsky  
RUCO  
1110 West Washington, Suite 220  
Phoenix, Arizona 85007  
[cfraulob@azruco.gov](mailto:cfraulob@azruco.gov)  
[procedural@ruco.gov](mailto:procedural@ruco.gov)  
[dpozefsky@ruco.gov](mailto:dpozefsky@ruco.gov)  
[jfuentes@ruco.gov](mailto:jfuentes@ruco.gov)  
**Consented to Service by Email**

Anthony Wanger  
IO Data Centers, LLC  
615 North 48th Street  
Phoenix, Arizona 85008

Tom C. Wray  
Southwestern Power Group  
3610 North 44th Street, Suite 250  
Phoenix, Arizona 85018

Meghan H. Grabel  
Osborn Maledon, P.A.  
2929 North Central Avenue  
Suite 2100  
Phoenix, Arizona 85012  
[kruht@omlaw.com](mailto:kruht@omlaw.com)  
[mgrabel@omlaw.com](mailto:mgrabel@omlaw.com)  
**Consented to Service by Email**

Nicholas C. Dranias  
500 East Coronado Road  
Phoenix, Arizona 85004

Kristin K. Mayes  
The Kris Mayes Law Firm, PLLC  
3030 North Third Street, Suite 200  
Phoenix, Arizona 85012

Garry D Hays  
Law Offices of Garry D. Hays, PC  
2198 East Camelback Road  
Suite 305  
Phoenix, Arizona 85016

Jeffrey Crockett  
Crockett Law Group, PLLC  
2198 East Camelback Road  
Suite 305  
Phoenix, Arizona 85016

Patrick Black  
Fennemore Craig, P.C.  
2394 East Camelback Road  
Suite 600  
Phoenix, Arizona 85016  
[pblack@fclaw.com](mailto:pblack@fclaw.com)  
[lfernigni@fclaw.com](mailto:lfernigni@fclaw.com)  
**Consented to Service by Email**

Alan Kierman  
IO Data Centers, LLC  
615 North 48th Street  
Phoenix, Arizona 85008

Craig A. Marks  
Craig A. Marks, PLC  
10645 North Tatum Boulevard  
Suite 200-676  
Phoenix, Arizona 85028

Jennifer A. Cranston  
Gallagher & Kennedy, P.A.  
2575 East Camelback Road  
Suite 1100  
Phoenix, Arizona 85016-9225  
[lgernet@azgt.coop](mailto:lgernet@azgt.coop)  
[jennifer.cranston@gknet.com](mailto:jennifer.cranston@gknet.com)  
[jwallace@gcseca.coop](mailto:jwallace@gcseca.coop)  
[JCanaca@gcseca.coop](mailto:JCanaca@gcseca.coop)  
**Consented to Service by Email**

Douglas V. Fant  
Southwestern Power Group  
3610 North 44th Street, Suite 250  
Phoenix, Arizona 85018  
[dfant@southwesternpower.com](mailto:dfant@southwesternpower.com)  
[dgetts@southwesternpower.com](mailto:dgetts@southwesternpower.com)  
[twray@southwesternpower.com](mailto:twray@southwesternpower.com)  
**Consented to Service by Email**

Matt Derr  
Southwest Gas Corporation  
1600 East Northern Avenue  
Phoenix, Arizona 85020

Michele Van Quathem  
Law Offices of Michele  
Van Quathem, PLLC  
7600 North 15th Street  
Suite 150-30  
Phoenix, Arizona 85020

Tom Harris  
Arizona Solar Energy Industries  
Association  
2122 West Lone Cactus Drive  
Suite 2  
Phoenix, Arizona 85027

Arizona Corporation Commission - Rulemaking

Docket No. RU-00000A-18-0284

Page 4

Robert J. Metli  
2398 East Camelback Road  
Suite 240  
Phoenix, Arizona 85016

Adam L. Stafford  
Western Resource Advocates  
Post Office Box 30497  
Phoenix, Arizona 85046  
[stacy@westernresources.org](mailto:stacy@westernresources.org)  
[adam.stafford@westernresources.org](mailto:adam.stafford@westernresources.org)  
[steve.michel@westernresources.org](mailto:steve.michel@westernresources.org)  
**Consented to Service by Email**

Vicki Sandler  
Arizona Independent Scheduling  
Administrators Association  
14402 South Canyon Drive  
Phoenix, Arizona 85048  
[vickisandler@gmail.com](mailto:vickisandler@gmail.com)  
**Consented to Service by Email**

William P. Sullivan  
Law Offices of William P. Sullivan,  
PLLC  
3240 East Union Hills Drive  
Suite 117  
Phoenix, Arizona 85050  
[ggouker@navopache.org](mailto:ggouker@navopache.org)  
[jccoury@hoolicourylaw.com](mailto:jccoury@hoolicourylaw.com)  
[cmoore@navopache.org](mailto:cmoore@navopache.org)  
[rheymann@swlaw.com](mailto:rheymann@swlaw.com)  
[tcarlson@mohaveelectric.com](mailto:tcarlson@mohaveelectric.com)  
[wps@sullivan.attorney](mailto:wps@sullivan.attorney)  
[maw@sullivan.attorney](mailto:maw@sullivan.attorney)  
**Consented to Service by Email**

Jeffrey J. Woner  
K.R. Saline & Assoc., PLC  
160 North Pasadena, Suite 101  
Mesa, Arizona 85201  
[jjw@krsaline.com](mailto:jjw@krsaline.com)  
**Consented to Service by Email**

Thomas A Loquvam  
Pinnacle West Capital Corporation  
Post Office Box 53999, MS 8695  
Phoenix, Arizona 85072  
[thomas.loquvam@pinnaclewest.com](mailto:thomas.loquvam@pinnaclewest.com)  
[Melissa.Krueger@pinnaclewest.com](mailto:Melissa.Krueger@pinnaclewest.com)  
[Kerri.Carnes@aps.com](mailto:Kerri.Carnes@aps.com)  
[Debra.Orr@aps.com](mailto:Debra.Orr@aps.com)  
[Thomas.Mumaw@pinnaclewest.com](mailto:Thomas.Mumaw@pinnaclewest.com)  
[Theresa.Dwyer@pinnaclewest.com](mailto:Theresa.Dwyer@pinnaclewest.com)  
**Consented to Service by Email**

Roy Archer  
Morenci Water & Electric Company  
Ajo Improvement Company  
Post Office Box 68  
Morenci, Arizona 85540

Gregory L. Bernosky  
Arizona Public Service Company  
MS 9712  
Post Office Box 53999

Phoenix, Arizona 85072

Deborah R. Scott  
Salt River Project  
Senior Director Regulatory Policy  
Post Office Box 52025 PAB4TB  
Phoenix, Arizona 85072-2025

Sidney Smith  
Hohokam Irrigation & Drainage District  
142 Smith Arizona Boulevard  
Coolidge, Arizona 85128

Dillon Holmes  
Clean Power Arizona  
9635 North 7th Street #47520  
Phoenix, Arizona 85068

Jeff Woner  
K.R. Saline & Associates, PLC  
160 North Pasadena, Suite 101  
Mesa, Arizona 85201  
[jjw@krsaline.com](mailto:jjw@krsaline.com)  
**Consented to Service by Email**

Court S. Rich  
Rose Law Group, PC  
7144 East Stetson Drive, Suite. 300  
Scottsdale, Arizona 85251

Thomas Harris  
Distributed Energy Resource Alliance  
5215 East Orchid Lane  
Paradise Valley, Arizona 85253

Jason Pistiner  
Singer Pistiner PC  
15849 North 71st Street, Suite 100  
Scottsdale, Arizona 85254

Stephanie Wojcik  
Town of Wickenburg  
155 North Tegner, Suite A  
Wickenburg, Arizona 85390

Mark Etherton  
Southwest Transmission Partners, LLC  
2172 East Calle de Arcos  
Tempe, Arizona 85284

Joe Cobb  
4814 West State Avenue  
Post Office Box 1855  
Glendale, Arizona 85311

Ajo Improvement Company  
Roy Archer, President/Manager  
Post Office Drawer 9, South Highway  
85  
Ajo, Arizona 85321

Karilee Ramaley  
Salt River Project Agricultural  
Improvement & Power District  
Post Office Box 52025 PAB4TA  
Phoenix, Arizona 85072

[Deborah.Scott@srpnet.com](mailto:Deborah.Scott@srpnet.com)  
[Josh.Robertson@srpnet.com](mailto:Josh.Robertson@srpnet.com)  
[Karilee.Ramaley@srpnet.com](mailto:Karilee.Ramaley@srpnet.com)  
**Consented to Service by Email**

Joseph W. Marvin  
Prime Solutions Group, INC.  
1300 South Litchfield Road,  
Building 125  
Goodyear, Arizona 85338  
[JoeMarvin@psg-inc.net](mailto:JoeMarvin@psg-inc.net)  
[meganrubstello@psg-inc.net](mailto:meganrubstello@psg-inc.net)  
**Consented to Service by Email**

Steve Jennings  
AARP  
16165 North 83rd Avenue  
Suite 201  
Peoria, Arizona 85382

John Wallace  
2210 South Priest Drive  
Tempe, Arizona 85282

Steven Lunt  
Duncan Valley Electric Cooperative  
Post Office Box 440  
Duncan, Arizona 85534

Michael E. Sheehan  
88 East Broadway Boulevard  
MS HQW803  
Tucson, Arizona 85701

Lewis M. Levenson  
1308 East Cedar Lane  
Payson, Arizona 85541

Alliant Gas, LLC  
200 West Longhorn Road  
Payson, Arizona 85541

Than W Ashby  
Graham County Electric Cooperative,  
Inc.  
9 West Center Street  
Post Office Drawer B  
Pima, Arizona 85543

Graham County Utilities, Inc.  
Gas Division  
Post Office Drawer B  
Pima, Arizona 85543

Patricia C. Ferre  
Post Office Box 433  
Payson, Arizona 85547

Christopher Hitchcock  
Law Offices of Christopher Hitchcock,  
P.L.C.  
One Copper Queen Plaza  
Post Office Box AT  
Bisbee, Arizona 85603

Arizona Corporation Commission - Rulemaking

Docket No. RU-00000A-18-0284

Page 5

Lawrence V. Robertson, Jr.  
Munger Chadwick, PLC  
210 West Continental Road  
Suite 216A  
Green Valley, Arizona 85622  
[Tubaclawyer@aol.com](mailto:Tubaclawyer@aol.com)  
[greg\\_bass@calpinesolutions.com](mailto:greg_bass@calpinesolutions.com)  
[mtierney-lloyd@enernoc.com](mailto:mtierney-lloyd@enernoc.com)  
**Consented to Service by Email**

Jack Blair  
311 East Wilcox  
Sierra Vista, Arizona 85635

Sulphur Springs Valley Electric  
Cooperative,  
Inc.  
350 North Haskell Avenue  
Willcox, Arizona 85643

Marshall Magruder  
Post Office Box 1267  
Tubac, Arizona 85646-1267

Vincent Nitido  
Trico Electric Cooperative, Inc  
8600 West Tangerine Road  
Marana, Arizona 85658

David G Hutchens  
UNS Electric, Inc.  
88 East Broadway Boulevard  
MS HQE901  
Post Office Box 711  
Tucson, Arizona 85701-0711

UNS Gas, Inc.  
Post Office Box 711, MS HQE910  
Tucson, Arizona 85702

UNS Electric, Inc.  
Attn: Melissa Morales  
Post Office Box 711 MS HQE910  
Tucson, Arizona 85702

Jeff Schlegel  
Sweep Arizona Representative  
1167 West Samalayuca Drive  
Tucson, Arizona 85704-3224

Raymond A Hagerman  
5101 College Boulevard  
Farmington, New Mexico 87402

Charles Kretke  
Columbus Electric Cooperative, Inc.  
Post Office Box 631  
Deming, New Mexico 88031

Russell E. Jones  
Waterfall, Economidis, Caldwell,  
Hanshaw &  
Villame  
5210 East Williams Circle  
Suite 800  
Tucson, Arizona 85711

A. B. Baardson  
6463 North Desert Breeze Court  
Tucson, Arizona 85750

Thomas L. Acker  
1605 North Wood Hollow Way  
Flagstaff, Arizona 86004

Northern Arizona University  
Karin Wadsack, Project Director  
Box 5694  
Flagstaff, Arizona 86011

Copper Market, Inc.  
Post Office Box 245  
Bagdad, Arizona 86321

Susan H. & Richard Pitcairn  
1865 Gun Fury Road  
Sedona, Arizona 86336

Nancy Baer  
245 San Patricio Drive  
Sedona, Arizona 86336

Rebecca Wenk  
Public Service Co. of New Mexico  
414 Silver Avenue SW  
Albuquerque, New Mexico 87102

William Gregory Kelly  
Frye Law Firm P.C.  
10400 Academy Road NE  
Suite 310  
Albuquerque, New Mexico 87111

W. Gregory Kelly  
Frye & Kelly, P.C.  
10400 Academy Road N.E.  
Suite 310  
Albuquerque, New Mexico 87111  
[wgk@fryelaw.us](mailto:wgk@fryelaw.us)  
**Consented to Service by Email**

Madonna Bixby  
PNM Resources  
Corporate Headquarters  
Albuquerque, Arizona 87158

Joanne Bradley  
Jacqueline DeRosa, Mike McGuffin  
Customized Energy Solutions  
101 Parkshore Drive - 100  
Folsom, California 95630

Sevasti Travlos  
The Alliance for Solar Choice LLC  
595 Market Street, 29th Floor  
San Francisco, California 94105

Catherine M Mazzeo  
Southwest Gas Corporation  
Post Office Box 98510  
Las Vegas, Nevada 89193  
[catherine.mazzeo@swgas.com](mailto:catherine.mazzeo@swgas.com)  
[matt.derr@swgas.com](mailto:matt.derr@swgas.com)

[carla.kolebuck@swgas.com](mailto:carla.kolebuck@swgas.com)  
**Consented to Service by Email**

Steven Rymsha  
SUNRUN INC.  
595 Market Street, 29th Floor  
San Francisco, California 94105

Kevin T. Fox  
Keyes & Fox LLP  
436 14th Street - 1305  
Oakland, California 94612

Andrew Wang  
SOLARRESERVE, LLC  
520 Broadway, 6th Floor  
Santa Monica, California 90401

Greg Bass  
Noble Americas Energy Solutions  
401 West A Street, Suite 500  
San Diego, California 92101-3017

Mario Natividad  
9244 Bermudez Street  
Pico Rivera, California 90660-4510

Lori A Dolqueist  
One Embarcadero Center, 30th Floor  
San Francisco, California 94111

Marta Darby  
Sierra Club  
2101 Webster Street, Suite 1300  
Oakland, California 94612  
[Sandy.bahr@sierraclub.org](mailto:Sandy.bahr@sierraclub.org)  
[katherine.ramsey@sierraclub.org](mailto:katherine.ramsey@sierraclub.org)  
[marta.darby@sierraclub.org](mailto:marta.darby@sierraclub.org)  
[katie.chamberlain@sierraclub.org](mailto:katie.chamberlain@sierraclub.org)  
**Consented to Service by Email**

Robin Mitchell  
Arizona Corporation Commission  
Director/Chief Counsel, Legal Division  
1200 West Washington Street  
Phoenix, Arizona 85007  
[legaldiv@azcc.gov](mailto:legaldiv@azcc.gov)  
[utildivservicebyemail@azcc.gov](mailto:utildivservicebyemail@azcc.gov)  
**Consented to Service by Email**

By: \_\_\_\_\_  
Edna Luna-Reza  
Administrative Support  
Specialist

**Arizona Corporation Commission Staff Implementation Plan for the Electric Vehicles,  
Electric Vehicle Infrastructure, and the Electrification of the Transportation Sector in  
Arizona Policy Statement**

**I. Introduction**

This document reflects the Arizona Corporation Commission's ("Commission") approach to the implementation of the Electric Vehicles, Electric Vehicle Infrastructure, and the Electrification of the Transportation Sector in Arizona Policy Statement ("Policy") that was adopted at the December 2018 Open Meeting (Decision No. 77044). It is intended to provide guidelines to Public Service Corporations ("PSCs") regulated by the Commission how to best implement the Policy.

Commission Staff ("Staff") hosted an Electric Vehicle ("EV") Stakeholder meeting on March 14<sup>th</sup>, 2019 and will host another meeting on March 26<sup>th</sup>, 2019 to discuss the implementation of the Policy. The March 14<sup>th</sup> Stakeholder Meeting served as an opportunity for the EV Stakeholders to give Staff recommendations on how to best implement the Policy. At that meeting Staff received comments from regulated utilities, businesses, advocacy groups, and the public. Based on the discussion at the March 14<sup>th</sup> meeting and the comments filed to the docket, Staff developed a draft Implementation Plan ("Plan") to serve as the basis for discussion at the March 26<sup>th</sup> meeting. At the March 26<sup>th</sup> meeting Staff anticipates receiving additional EV Stakeholder feedback on the Plan. With the feedback from the March 26<sup>th</sup> meeting and the comments filed to the docket, Staff will produce a revised Plan. It is Staff's goal to present the proposed Plan to the Commission at the April 2019 Open Meeting for discussion, consideration, and possible approval.

**II. Policy Statements and Implementation Plan**

1. Public Service Corporations can play an integral role in promoting Electric Vehicles, Electric Vehicle Infrastructure, and the Electrification of the Transportation Sector in Arizona, and their participation should be encouraged as set forth herein.
  - A. All PSCs are encouraged to propose pilot programs to the Commission by June 1<sup>st</sup>, 2019. In its proposal the regulated entities are encouraged to focus on the deployment of EV infrastructure, charging stations, charging patterns, EV fleet charging, make-ready infrastructure, rate designs, incentives, and customer education. Staff intends to present recommendations on the proposed pilot programs submitted to the Commission at the Commission's August 2019 Open Meeting. The pilot programs will continue until further order by the Commission.
  - B. Cost recovery for all approved pilot programs shall be addressed in the Company's next rate case. PSCs may request an accounting order to track all pilot program investments.
2. Public Service Corporations are encouraged by the Commission to develop educational and outreach programs (subject to Commission oversight) as they relate to Electric

Vehicles, Electric Vehicle Infrastructure, and the Electrification of the Transportation Sector and may request cost recovery for Electric Vehicle programs including education and outreach programs.

- A. Education and outreach programs should be done with Commission oversight. PSCs may seek cost recovery for education and outreach programs in the Company's next rate case. PSCs may request an accounting order to track these costs.
3. Public Service Corporations and stakeholders will develop best practices for Commission consideration that include consumer protections.
- A. Current best practices for PSCs should include at a minimum the following:
    - i. Charging infrastructure should be based on open technical standards to ensure interoperability, customer switching capability, and minimum risk of stranded assets.
    - ii. Charging infrastructure should provide payment options with credit card readers as a minimum to ensure universal customer access.
    - iii. Charging infrastructure should be available to various vehicle and customer segments such as government buildings, houses of worship, residential homes, multi-dwelling units, and across a broad spectrum of vehicle types.
    - iv. Electric vehicle infrastructure equipment, software and services should be procured directly and in bulk through a fair and open Request for Proposal process to maximize cost effectiveness and ensure a competitive market.
    - v. DC fast charging stations should be 200kW or higher to minimize the risk of assets becoming obsolete.
4. Public Service Corporations should maximize electric grid benefits through appropriate rate designs applicable to EV charging. To accomplish this, PSCs are expected to propose optional rate design tariffs to encourage customers to charge vehicles during off-peak hours, creating overall system benefits.
- A. PSCs are encouraged to:
    - i. Propose rate design tariffs that incentivize customers to charge vehicles during off-peak, and to take advantage of negative pricing.
    - ii. Propose rate design tariffs that alleviate the issues that non-regulated entities face when deploying DC fast charging stations.
    - iii. Work with the non-regulated entities in developing DC fast charging rate design tariffs.

5. Public Service Corporations could deploy EV charging stations in identified areas of inadequate coverage, such as but not limited to, rural and low-income areas, multi-dwelling units, interstate corridors or highways, and other areas. If the Public Service Corporation deploys EV charging stations, the prudent costs of this infrastructure may be included in rate base.
  - A. In deploying EV charging stations, PSCs are encouraged to explore deployments in areas of inadequate coverage such as rural and low-income areas, multi-dwelling units, interstate corridors or highways, and other areas.
  - B. If the market where the infrastructure is proposed has other providers and is competitive, the PSC should provide information to the Commission and Staff on the degree of competition in the particular market and the need for PSC infrastructure.
6. Public Service Corporations should be encouraged to adopt pilot programs to obtain valuable information on the deployment of EV infrastructure and charging stations, customer charging patterns, and the need for rate designs and incentive programs. Participating utilities are expected to file quarterly updates on such programs with the Commission in this docket.
  - A. A report containing information gathered from pilot programs should be filed in this docket on a quarterly basis to allow the Commission and Staff to evaluate the effectiveness of the EV pilot programs and to make further recommendations on the issues covered.
7. The proliferation of EVs will have an impact on certain infrastructure needs and expenses of Public Service Corporations. This information should be included in their Integrated Resource Plans in the future.
  - A. PSCs should include EV infrastructure plans, needs and costs in their future Integrated Resource Plans.
8. Public Service Corporations should work with non-regulated entities to determine the location of charging and DC fast charging infrastructure where joint investment and ownership may be appropriate.
  - A. Where low utilization is directly caused by the high cost of make-ready infrastructure, it may be appropriate for PSCs to bear the cost of the make-ready infrastructure, while non-regulated entities will bear any additional costs.
  - B. Where joint investment with non-regulated entities is appropriate, PSCs may be permitted to do so.

- C. PSCs are encouraged to work with developers where make-ready infrastructure during new construction may be appropriate.
  - D. PSCs are encouraged to coordinate with non-regulated entities to ensure public health, safety and reliability in the maintenance of charging stations and related infrastructure.
9. The Commission will work with the Governor's Office, the legislature, and the Maricopa Association of Governments and other State agencies such as Arizona Department of Transportation, Arizona Department of Environmental Quality, and Chambers of Commerce to promote Electric Vehicles, Electric Vehicle Infrastructure, and the Electrification of the Transportation Sector in Arizona.
- A. In addition to the above listed agencies Staff recommends that the Commission work with Congress and Federal agencies where appropriate.
10. Commission Staff will continue discussions with stakeholders on the issue of Electric Vehicles, Electric Vehicle Infrastructure, and the Electrification of the Transportation Sector through future stakeholder meetings and will report to the Commission on a quarterly basis with recommendations for the Commissions further consideration.
11. Commission Staff will work with stakeholders to develop details on implementation on a company by company basis to present for Commission consideration at future open meetings.